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RECEIVED

SEP 27 2017

AIR ENFORCEMENT BRANCH
U.S. EPA REGION 5

CERTIFIED MAIL # 91 7108 2133 3932 1837 0359

September 5, 2017

Re: Core Molding Technologies, Inc.
Notice of Violation (NOV)
Air Permit
Franklin County
0125041046

Michael Bishop
Core Molding Technologies, Inc.
800 Manor Park
Columbus, OH 43228

Subject: Notice of Violation/Partial Resolution of Violation

Dear Mr. Bishop:

On July 31, 2017, Ohio EPA, Central District Office, received a quarterly deviation report from Core Molding Technologies, Inc. (Core) for the second quarter of 2017. On August 3, 2017, Ohio EPA reviewed the quarterly deviation report in accordance with the terms and conditions of the facility's active PTI (P0122171) and extended Title V permit (P0082800). In the quarterly deviation report, Core reported approximately 36 hours on June 26 and 27, 2017 when the regenerative thermal oxidizer (RTO) controlling emissions units P007 and P062 was not operating while P007 and P062 were operating.

In addition, on August 9, 2017, Ohio EPA, received a phone call and email from Lewis Alley of Core providing notification of a malfunction due to a fire of the RTO controlling emissions units P007 and P062, specifically damage to an expansion joint, resulting in the temporary inability to operate the RTO until repairs were made. Ohio EPA and Core had several follow-up communications regarding this malfunction between August 9 and 12, 2017. This communication included notification that the RTO was not operated on August 9 and 10, 2017, but P007 and P062 were each operated for two eight-hour shifts on those days. On August 12, 2017, Ohio EPA was notified via email by Mike Bishop of Core that the necessary repair was made on the RTO and the RTO was again operating beginning August 12, 2017. On August 17, 2017, Allie Fair and Pam McCoy of Ohio EPA, Central District Office, visited Core to review facility operations and records of SMC manufacturing machines P007 and P062 and the RTO controlling P007 and P062. Some records were available for review, but some records were not kept as required by rule and by permit terms and conditions.

Findings 1 through 4

As a result of the review of the 2nd quarter 2017 deviation report, the malfunction notification and subsequent communications between August 9, 2017 and August 12, 2017, and a review of facility records for P007 and P062 on August 17, 2017, Ohio EPA has determined that the following are violations of ORC Chapter 3704, OAC Chapter 3745, and Core's permit terms and conditions.

1. **OAC rule 3745-15-06(B)(1):** *"In the event that any emission source, air pollution control equipment, or related facility breaks down in such a manner as to cause the emission of air contaminants in violation of any applicable law, the person responsible for such equipment shall immediately notify the Ohio environmental protection agency district office or delegate agency of such failure or breakdown. If the malfunction continues for more than seventy-two hours, the source owner or operator shall provide a written statement to the director within two weeks of the date the malfunction occurred."*

OAC rule 3745-15-06(B)(2): *"The Ohio environmental protection agency district office or delegate agency shall be notified when the condition causing the failure or breakdown has been corrected and the equipment is again in operation. Notification of the correction of the condition causing the failure or breakdown may be given verbally if the duration of the malfunction is seventy-two hours or less. Otherwise, such notification shall be in writing."*

PTI P0122171, Term A.5: *"The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06."*

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s)."

Title V permit P0082800, Term A.27.: *"The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s)."*

ORC chapter 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

ORC chapter 3704.05(J)(2): *"No person shall...[v]iolate any applicable requirement of a Title V permit or any permit condition...or filing requirement of the Title V permit program, any duty to allow or carry out inspection, entry, or monitoring activities, or any rule adopted or order issued by the director pursuant to the Title V permit program."*

- (a) Core failed to immediately notify Ohio EPA of the malfunction of the RTO controlling emissions units P007 and P062 on June 26 and 27, 2017
- (b) Core failed to shutdown emissions units P007 and P062 during the malfunction of the RTO controlling those emissions units on June 26 and 27, 2017.

- (c) Core failed to provide notification to Ohio EPA that the condition causing the failure or breakdown of the RTO controlling emissions units P007 and P062 was corrected and that the RTO was again in operation following the June 26 and 27, 2017 malfunction.
- (d) Core failed to shutdown emissions P007 and P062 during the malfunction of the RTO controlling those emissions units on August 9 and 10, 2017

2. **PTI P0122171, Term C.1.b)(1)b. and Title V permit P0082800, Term C.1.b)(1)b.:**
"Organic compound emissions shall not exceed 44.2 pounds per day."

ORC chapter 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

ORC chapter 3704.05(J)(2): *"No person shall...[v]iolate any applicable requirement of a Title V permit or any permit condition...or filing requirement of the Title V permit program, any duty to allow or carry out inspection, entry, or monitoring activities, or any rule adopted or order issued by the director pursuant to the Title V permit program."*

- (a) Organic compound emissions from P007 on June 27, 2017, were estimated by Core to be 58.17 pounds, which exceeds the daily limit by 13.97 pounds.
 - (b) Organic compound emissions from P007 on August 9, 2017, were estimated by Core to be 218.77 pounds, which exceeds the daily limit by 175.57 pounds.
 - (c) Organic compound emissions from P007 on August 10, 2017, were estimated by Core to be 166.62 pounds, which exceeds the daily limit by 122.42 pounds.
3. **OAC rule 3745-21-25(D)(8):** *"Except where exempted under paragraph (D)(9) of this rule, any owner or operator of a SMC manufacturing machine shall install and operate a VOC emission control system that reduces the VOC emissions from the SMC manufacturing machine by at least ninety-five per cent by weight (i.e., an overall control efficiency of at least ninety-five per cent by weight)."*

PTI P0122171, Term C.1.b)(2)b. and Title V permit P0082800, Term C.1.b)(2)b.: *"The permittee shall operate a VOC emission control system that reduces the VOC emissions from the SMC manufacturing machine by at least 95% by weight."*

PTI P0122171, Term C.2.b)(2)a.: *"The permittee shall operate a VOC emission control system that reduces the VOC emissions from the SMC manufacturing machine by at least 95% by weight (i.e., an overall control efficiency of at least 95% by weight)."*

ORC chapter 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

ORC chapter 3704.05(J)(2): *"No person shall...[v]iolate any applicable requirement of a Title V permit or any permit condition...or filing requirement of the Title V permit program, any duty*

to allow or carry out inspection, entry, or monitoring activities, or any rule adopted or order issued by the director pursuant to the Title V permit program."

- (a) Core failed to reduce the VOC emissions from the SMC manufacturing machines (P007 and P062) by at least 95% by weight for approximately 36 hours on June 26 and 27, 2017.
 - (b) Core failed to reduce the VOC emissions from the SMC manufacturing machines (P007 and P062) by at least 95% by weight on August 9 and 10, 2017.
4. **PTI P0122171, Terms C.1.b)(2)g. and C.2.d)(2):** *"The combustion temperature within the regenerative thermal oxidizer, when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. Based on the emission test conducted on October 29, 2015, the combustion temperature within the regenerative thermal oxidizer shall not be less than 1430 degrees Fahrenheit."*

Title V permit P0082800, Term C.1.b)(2)f.: *"The average combustion temperature within the regenerative thermal oxidizer, when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance."*

ORC chapter 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

ORC chapter 3704.05(J)(2): *"No person shall...[v]iolate any applicable requirement of a Title V permit or any permit condition...or filing requirement of the Title V permit program, any duty to allow or carry out inspection, entry, or monitoring activities, or any rule adopted or order issued by the director pursuant to the Title V permit program."*

- (a) Core failed to maintain the combustion temperature within the RTO controlling emissions units P007 and P062 at or above 1430 degrees Fahrenheit while P007 and P062 were in operation on June 26 and 27, 2017.
- (b) Core failed to maintain the combustion temperature within the RTO controlling emissions units P007 and P062 at or above 1430 degrees Fahrenheit while P007 and P062 were in operation on August 9 and 10, 2017.

Resolution of Violations 1 through 4

According to the 2nd quarter 2017 deviation report submitted on July 31, 2017, an inspection of the RTO controlling emissions units P007 and P062 was completed by maintenance personnel on June 26 and 27, 2017. Maintenance determined a blower was not purging the gas which was preventing the RTO from igniting. Maintenance identified an overload tripped on the motor. After correcting this, the RTO was reset and brought up to the permitted temperature. Based on the information provided, it appears that the facility completed the necessary corrective actions to bring the RTO and emissions units P007 and P062 into compliance. The violations cited above that occurred on June 26 and 27, 2017 are therefore considered resolved.

On August 9, 2017, Lewis Alley of Core notified Ohio EPA of a fire that was identified shortly after midnight in an expansion joint of the RTO controlling emissions units P007 and P062. According to an email from Mike Bishop of Core sent on August 12, 2017, the damaged expansion joint on the RTO was repaired and the RTO began operating at or above the permitted temperature. Photographs of the repair were also submitted. Based on the information provided, it appears that the facility completed the necessary corrective actions to bring the RTO and emissions units P007 and P062 into compliance. The violations cited above that occurred on August 9 and 10, 2017 are therefore considered resolved.

Findings 5 and 6

On August 17, 2017, Ohio EPA reviewed available records maintained at Core for emissions units P007 and P062. As a result of the records review and subsequent communication between Ohio EPA and Core on August 17 through 29, 2017, Ohio EPA has determined that the following are violations of ORC Chapter 3704, OAC Chapter 3745, and Core's permit terms and conditions.

5. **OAC rule 3745-21-25(O)(2)(a)(i):** *"If using an add-on control device, the owner or operator shall during production collect and keep a record of data as indicated in 40 CFR part 63, subpart SS and shall monitor and collect the following data:...except for monitoring malfunctions, associated repairs, and required quality assurance or control activities..., the owner or operator shall conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the controlled operation is operating."*

40 CFR 63.988(c): *"Where an incinerator...is used, a temperature monitoring device capable of providing a continuous record...is required...Monitoring results shall be recorded as specified in §63.998(b) and (c), as applicable."*

OAC rule 3745-21-25(P)(1)(b): *"The owner or operator shall keep the following records:[f]or any add-on control device, all records required in 40 CFR part 63, subpart SS, to show continuous compliance with this rule."*

40 CFR 63.998(b)(1): *"Where this subpart requires a continuous record, the owner or operator shall maintain...a record of values measured at least once every 15 minutes or each measured value for systems which measure more frequently than once every 15 minutes..."*

40 CFR 63.998(b)(3): *"In addition to the records specified in paragraph (a), owners or operators shall keep records as specified in paragraphs (b)(3)(i) and (ii) of this section..."*

(i) Except as specified in paragraph (b)(3)(ii) of this section, daily average values of each continuously monitored parameter shall be calculated from data meeting the specifications of paragraph (b)(2) of this section for each operating day and retained for 5 years...

(ii) If all recorded values for a monitored parameter during an operating day are within the range established in the...operating permit, the owner or operator may record that all values were within the range and retain this record for 5 years rather than calculating and recording a daily average for that operating day..."

PTI P0122171, Term C.1.b)(2)f. and Title V permit P0082800, Term C.1.b)(2)e.: *"The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the regenerative thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee."*

PTI P0122171, Term C.2.d)(3): *"The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee."*

PTI P0122171, Terms C.1.d)(1)a. and C.2.d)(4)a.: *"The permittee shall collect and record the following information for each day for the control equipment: ...the continuous combustion temperature within the regenerative thermal oxidizer."*

PTI P0122171, Terms C.1.d)(4) and C.2.d)(5) and Title V permit P0082800, Term C.1.d)(5): *"The permittee shall maintain the records necessary to demonstrate compliance with the applicable monitoring and recordkeeping requirements of OAC rule 3745-21-25 as specified in OAC rules 3745-21-25(O) and 3745-21-25(P)."*

Title V permit P0082800, Term C.1.d)(1)a.: *"The permittee shall collect and record the following information for each day for the control equipment: ...the average daily combustion temperature within the regenerative thermal oxidizer."*

ORC chapter 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

ORC chapter 3704.05(J)(2): *"No person shall...[v]iolate any applicable requirement of a Title V permit or any permit condition...or filing requirement of the Title V permit program, any duty to allow or carry out inspection, entry, or monitoring activities, or any rule adopted or order issued by the director pursuant to the Title V permit program."*

(a) Core failed to operate and maintain a continuous temperature recorder of the combustion temperature within the RTO controlling emissions units P007 and P062 and maintain records of the continuous and daily average temperatures within the RTO from June through August, 2017, intermittently. Specific dates requested (June 26 and 27, 2017 and August 9 and 10, 2017) were not maintained.

(b) Requested action: Within 30 days of receipt of this letter, Core shall submit a summary detailing the continuous and daily average temperature records available from the date of the last site visit associated with a full compliance evaluation (October 29, 2015) through the date of this letter. Core shall also submit a compliance plan to Ohio EPA detailing how Core will address the violation identified above.

- 6 **OAC rule 3745-21-25(P)(2)(a):** *"Regardless of any exclusion in paragraph (A)(2)(e) of this rule, the owner or operator of a SMC manufacturing machine shall keep the follow records:*
(a) Monthly production records of the following operational data for each SMC manufacturing machine:
(i) The amount of SMC produced for each type of SMC product.
(ii) The monomer content of each SMC product."

PTI P0122171, Terms C.1.d)(4) and C.2.d)(5) and Title V permit P0082800, Term C.1.d)(5):
"The permittee shall maintain the records necessary to demonstrate compliance with the applicable monitoring and recordkeeping requirements of OAC rule 3745-21-25 as specified in OAC rules 3745-21-25(O) and 3745-21-25(P)."

ORC chapter 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

ORC chapter 3704.05(J)(2): *"No person shall...[v]iolate any applicable requirement of a Title V permit or any permit condition...or filing requirement of the Title V permit program, any duty to allow or carry out inspection, entry, or monitoring activities, or any rule adopted or order issued by the director pursuant to the Title V permit program."*

(a) Core failed to maintain records of the monomer content of each SMC product from October 29, 2015 (the date of the last site visit associated with a full compliance evaluation) through August 17, 2017.

(b) Requested action: Within 30 days of receipt of this letter, Core shall submit a compliance plan to Ohio EPA detailing how Core will address the violation identified above.

Conclusion for Violations 5 and 6

Ohio EPA requests that Core promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. Within 30 days of receipt of this letter, please provide to Ohio EPA the documentation requested above. If you have already resolved the violations listed above, thank you and please provide documentation supporting compliance. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate.

Failure to comply with Chapter 3704 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, Core is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Michael Bishop
Core Molding Technologies, Inc.
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Please note that this letter and the submission of any requested information to respond to this letter does not constitute a waiver from, nor preclude the director from, seeking administrative or civil penalties pursuant to Section 3704.06 of the Ohio Revised Code.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact Allie Fair by phone at (614) 728-3802 or by e-mail at alexandria.fair@epa.ohio.gov.

Sincerely,



Kelly Saavedra
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: Kelly Toth, Manager, DAPC/CDO
ec: John Paulian, DPAC/CO
James Kavalec, DAPC/CO

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bc: Brian Dickens, USEPA, Region V